

# **EXHIBIT 2**

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UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT  
CASE NO. 2:21-cv-00053

ROBERT WOLFE and CROSSFIELD,  
INC.,

Plaintiffs,

-vs-

ENOCHIAN BIOSCIENCES, INC., et  
al,  
Defendants.

\_\_\_\_\_ /

VIDEOTAPED AUDIO-VISUAL DEPOSITION OF  
LUISA PUCHE  
\*HIGHLY CONFIDENTIAL\*

Wednesday, June 15, 2022  
10:09 a.m. - 1:37 p.m.

Luisa Puche  
Miami-Dade County, Florida

Stenographically Reported By:  
Aurora C. Sloan, FPR

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1 half or so, where I slowly reentered the workforce,  
2 again as a consultant doing the same thing that I  
3 did last time, until this current role.

4 Q. Do you hold any professional licenses  
5 or a CPA or anything like that?

6 A. I took the exam, but unfortunately, in  
7 Florida, it's 150 credits, and I was a late bloomer  
8 and had children and worked, just never got to do  
9 that extra education, but I did take the exam and  
10 passed it.

11 Q. And Ms. Puche, what's your current  
12 role at Enochian?

13 A. Chief --

14 Q. Or let me clarify. Enochian  
15 BioSciences, the U.S. company.

16 A. Chief financial officer.

17 Q. Do you have any current role for  
18 Enochian ApS, which I refer to as the Danish  
19 company?

20 A. No. Other than I consolidate -- I  
21 gather the information and consolidate it for our  
22 public filings.

23 Q. And Enochian ApS is a subsidiary, so  
24 they are grouped in with the filings for Enochian  
25 BioSciences?

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1 A. Yes.

2 Q. Does Enochian ApS have a separate CFO  
3 or is that your role as well?

4 A. I am not the CFO of ApS.

5 Q. Do they have a separate one?

6 A. They have a CEO. There really is no  
7 reason to have a CFO. It doesn't have any  
8 activity, really, to be quite frank with you. Very  
9 minimal administrative costs.

10 Q. Ms. Puche, I'm going to attempt to do  
11 a document share here through Exhibit Share. So  
12 bear with me. I think it takes one second to --

13 A. Okay.

14 Q. -- do it correctly.

15 (Thereupon, Plaintiff Exhibit 1, 2019  
16 Luisa Puche Compensation Breakdown, was  
17 marked for Identification.)

18 MR. MCCABE: Okay. So if I did it  
19 right, everyone has access to what's been  
20 marked as Plaintiff's Exhibit 1.

21 Did that come through for everybody?

22 THE WITNESS: I don't see anything on  
23 the screen.

24 THE COURT STENOGRAPHER: You have to  
25 refresh.

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1 BY MR. MCCABE:

2 Q. So -- I --

3 A. I don't understand the question. You  
4 have to rephrase.

5 Q. Okay. Yeah.

6 MR. VALENTE: Yeah.

7 BY MR. MCCABE:

8 Q. I'll rephrase the question.

9 Do you know the last time that Serhat  
10 had private security that was paid by Enochian  
11 BioSciences?

12 A. May of this year.

13 Q. So until he was arrested?

14 MR. VALENTE: Objection.

15 You can answer that question.

16 A. Yes.

17 BY MR. MCCABE:

18 Q. What was the last full month invoice  
19 for for Serhat's security?

20 MR. VALENTE: Objection, form.

21 To the extent you can answer that.

22 A. 45,000.

23 BY MR. MCCABE:

24 Q. Was that within the range that you  
25 typically observed?

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1 employee.

2 Q. So as the only corporate  
3 representative, it fell on you to sign the verified  
4 complaint?

5 A. Correct.

6 Q. Did you have any discussion with the  
7 board about why they were filing the complaint?

8 MR. VALENTE: Objection as to form,  
9 but go ahead if you recall.

10 A. Didn't have a direct conversation with  
11 the board. I was just told of the decision.

12 BY MR. MCCABE:

13 Q. Did you do any sort of investigation  
14 or have conversations about what was in the  
15 verified complaint and the allegations against  
16 Mr. Wolfe?

17 MR. VALENTE: Objection, form.

18 A. I spoke to the people that I needed to  
19 speak to. And to the extent that there may have  
20 been something, I don't remember everything that is  
21 in that verified claim, so I'd have to see it.  
22 But, you know, I did do some due diligence to be  
23 able to sign off as it being reasonable.

24 BY MR. MCCABE:

25 Q. Who did you speak to? You said you

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1 spoke to people.

2 A. I spoke to, at the time, Evelyn D'An,  
3 which was on a committee chair, Mark Dybul. I may  
4 have -- I'm not sure if I spoke -- legal counsel.

5 Q. When you spoke to either Evelyn or  
6 Mark, were you trying to gather more information or  
7 why were you speaking to them?

8 MR. VALENTE: Objection, form.

9 A. Part of it is because I didn't know --  
10 you know, a lot of things happened prior to my  
11 being here, so I didn't have personal knowledge.

12 Oh, it's -- sorry. We're having  
13 technical difficulties.

14 BY MR. MCCABE:

15 Q. Goes around.

16 Do you have any concerns with what the  
17 allegations of Bob -- against Bob and Crossfield  
18 were?

19 MR. VALENTE: Objection, form.

20 A. I'm not sure I understand the  
21 question.

22 BY MR. MCCABE:

23 Q. Were you confident that the  
24 allegations were accurate?

25 A. I felt they were reasonable.

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1 D&O insurance paid for his legal bills, but I can't  
2 tell you off the top of my head what that number  
3 is.

4 Q. Do you have access to that  
5 information?

6 A. I believe we could get it, but I don't  
7 have it readily available.

8 Q. Do you have any information about  
9 what's happening with the Danish litigation  
10 currently?

11 MR. VALENTE: Objection, form.

12 A. I'm not involved. I know high level  
13 what it's about, but I am not in the day-to-day  
14 movement of that case.

15 BY MR. MCCABE:

16 Q. Have you ever been asked to be a  
17 representative or a witness in that case the way  
18 you were for the state court?

19 A. No.

20 Q. Broadly speaking, are you aware of  
21 anybody at Enochian who has any ill-will towards  
22 Bob Wolfe or Crossfield?

23 A. I can't speak for other people's  
24 opinion, but -- people's feelings, but I have never  
25 -- to be quite honest with you, he's never



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1 discussed in our organization. So I believe that  
2 no one has any ill-will towards him, as I perceive  
3 it.

4 MR. MCCABE: Okay. I think that's all  
5 the questions I have for you, Ms. Puche.

6 I assume your attorneys could ask you  
7 questions, but I doubt they will.

8 MR. VALENTE: Give me -- Mr. McCabe,  
9 if you can give me --

10 MR. MCCABE: You want to do a comfort  
11 break?

12 MR. VALENTE: I don't know, maybe,  
13 like, 10 minutes and we'll reconvene and  
14 we'll see if I have anything?

15 MR. MCCABE: Sure.

16 MR. VALENTE: Great.

17 MR. MCCABE: Thank you.

18 THE VIDEOGRAPHER: We're going off the  
19 record at 1:18.

20 (Whereupon, a short break was taken  
21 and, upon reconvening, the following  
22 proceedings were had:)

23 THE VIDEOGRAPHER: We are back on the  
24 record at 1:32.

25 CROSS EXAMINATION

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1 BY MR. VALENTE:

2 Q. All right. So I have just a few  
3 questions. And Ms. Puche, we'll start with  
4 something we talked about this morning.

5 You recall we talked about the  
6 verified complaint on behalf of the Enochian  
7 entities that you signed in the Vermont action.

8 Do you recall that?

9 A. Yes.

10 Q. And I believe Mr. McCabe asked you  
11 about the accuracy of the verified complaint.

12 Do you remember that line of  
13 questions?

14 A. Yes.

15 Q. And I believe one of your answers  
16 discussed reasonableness.

17 Can you explain what you meant by  
18 reasonableness?

19 A. What I was trying to say is that I  
20 performed what I felt was a reasonable amount of  
21 effort to be able to determine that these were  
22 accurate statements at the time.

23 Q. Can you describe some of that effort?

24 A. Yeah. Discussions with the folks that  
25 I mentioned before. I looked at the exhibits, and

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1 I read the verified complaint.

2 Q. And do you believe that all of the  
3 statements in the complaint were true and accurate  
4 as of the date you signed it?

5 A. As of the date I signed it, I did.

6 Q. One other followup question. It  
7 relates to a question Mr. McCabe asked you much  
8 more recently.

9 Mr. McCabe asked you about insurance  
10 payments to Mr. Wolfe, and specifically, I believe  
11 he asked you if you had access to documents or  
12 information relating to those payments.

13 Could you clarify, does Enochian have  
14 access to the documents and information from the  
15 insurance company related to Mr. Wolfe's claim?

16 A. No. I thought he was talking about  
17 the amount.

18 We actually asked, but they said that  
19 it was privileged, and we could not have access to  
20 it. They just told us what they paid out.

21 MR. VALENTE: Okay. That's all I have  
22 for the witness.

23 THE VIDEOGRAPHER: You are muted, sir.

24 MR. MCCABE: Is that better?

25 THE VIDEOGRAPHER: Yes.

***Robert Wolfe and Crossfield, Inc. v. Enochian BioSciences, Inc. et al.,***  
**Civil Action No. 2:21-cv-00053-cr (D. Vt.)**

**WITNESS:** Luisa Puche

**DATE OF DEPOSITION:** June 15, 2022

**DEPOSITION ERRATA SHEET**

<b>Page No.:</b>	<b>Line No.:</b>	<b>Change or Correction and Reason:</b>
16	5	Change “approximate” to “approximately” (Correction)
29	8-9	Change “He’d participate in that team.” to “He would have participated in the board meeting as part of the scientific team.” (Clarification)
31	7	Change “bodyguard” to “a bodyguard” (Correction)
32	19	Change “he” to “Enochian BioSciences” (Clarification)
34	19	Change “Vendor.” to “The vendor.” (Clarification)
46	25	Change “Today -- and” to “And” (Clarification)
47	11	Change “license” to “science” (Clarification)
63	10	Change “Didn’t” to “I didn’t” (Correction)
63	21	Change “claim” to “complaint” (Clarification)
64	3	Change “which” to “who” (Correction)
64	3	Change “on a” to “audit” (Correction)
75	10-11	Change “but as an exhibit, I did see that there was action to seal it” to “but from what I recall, I believe there was action to seal it” (Clarification)
76	24	Change “I did” to “that was my understanding (Clarification)
82	7	Change “probably not.” to “probably not but it would depend on the circumstances.” (Clarification)
84	20	Change “in” to “on” (Correction)
104	11	Change “No, don’t understand” to “No, I don’t understand.” (Correction)
106	4	Change “his” to “Mr. Gumrukcu’s” (Clarification)

SIGNATURE:   
 LUISA PUCHE

DATE: 7/19/2022